

**REMARKS**

The present paper is in response to the non Final Office Action dated March 7, 2007. Claims 1-13, of which claims 1 and 7 are independent claims, were originally pending in the application. Applicants amend claims 1, 3-7, and 9-13. The amended claims introduce no new matter and are fully supported by the specification. The Applicants respectfully submit that the pending claims 1-13 are in condition for allowance in view of the amendments and following remarks.

**A. Claim Objections:**

The Examiner objected to claims 1, 3-7, and 9-13 because of informalities due to "TTY" being not spelled out in the claims. The Applicants have amended claims 1, 3-7, and 9-13 to distinctly point out that TTY is an acronym for "teletypewriter."

Accordingly, the Applicants respectfully request that this objection be withdrawn with respect to claims 1, 3-7, and 9-13.

**B. Claim Rejections under 35 U.S.C. § 103(a):**

The Examiner rejects claims 1-13 as being unpatentable over Vejlgaard (United States Patent Application Publication No. US2003/0053603) in view of Lieberman et al. (U.S. Patent No. 6,385,463). In light of the arguments contained herein, the Applicant respectfully requests that this rejection be withdrawn.

In contrast with claim 1, Vejlgaard fails to teach or suggest a "mobile communication device having TTY communication capability" and comprising "conversion information stored in said memory for conversion between alphanumeric data and TTY formatted data" (See Applicant's Claims). Specifically, Vejlgaard fails to teach a mobile communication device that has integrated TTY communication capability and that stores conversion information to convert between alphanumeric data and TTY formatted data. That is, Vejlgaard teaches a mobile device "system" that includes a mobile device, i.e., mobile communication device(230), connected by way of a serial cable, i.e., smartcable (220) to a TTY device (210). (See Vejlgaard, paragraph [0025]). Thus, Vejlgaard is simply cumulative of the prior art disclosed in the "Background" of the present application. (See Applicants' Specification pages 4-5).

The user of the "mobile device system," taught in Vejlgaard, would input data (i.e., communicate) directly through the TTY device itself rather than through the alphanumeric keyboard of the mobile device. Therefore, there would be no reason for an alphanumeric data to TTY formatted data conversion operation to occur in the mobile device at all using the Vejlgaard system. As such, it **cannot** be obvious that there is alphanumeric data to TTY formatted data conversion information stored in the memory of the mobile device taught in Vejlgaard as asserted by the Examiner (See Office Action of March 7, 2007). Lieberman et al. fails to cure the deficiencies of Vejlgaard as it is completely silent as to a mobile

device with a memory portion that stores alphanumeric data to TTY formatted data conversion information.

Furthermore, in contrast with claims 3-6, Veilgaard fails to teach or suggest a "mobile communication device" that includes an "encoder for encoding teletypewriter (TTY) packet extension data" (See Claim 3), a "decoder for decoding teletypewriter (TTY) formatted data" (See Claim 4), a "teletypewriter (TTY) tone generator for generating TTY tone formatted data for transmission" (See Claim 5), and a "teletypewriter (TTY) tone detector for detecting TTY tone formatted data" (See Claim 6), for the same reasons as those discussed above. More specifically, the encoder, decoder, tone generator, and tone detector identified in the Action are clearly not part of mobile device 130 or 130. Therefore, it cannot be asserted that, e.g., mobile device 230 comprises these items as the Action attempts.

Mainly, Veilgaard teaches a "system" that is essentially a coupling of a separate TTY device via a serial cable to a separate mobile communication device, which, as discussed above, is the prior art that the Applicants' claimed invention replaces. (See page 5,lines 16-19). The mobile device taught in Veilgaard has no capability to decode or encode TTY packets (this is performed by the smartcard serial cable, See Veilgaard, Figure 2, paragraph [0025]) nor does it generate or detect TTY tones (this is performed by the TTY device, See Veilgaard, Figure 2, paragraph [0021]). Lieberman et al. fails to cure the deficiencies of Veilgaard as it is completely silent as to these component features being integrated together in a mobile communication device.

For at least the above reasons, the Applicants respectfully request that this rejection be withdrawn for claims 1 and 3-6. Claim 2 depends directly off of claim 1. Accordingly, the Applicants respectfully submit that claims 1-6 are in condition for allowance.

In contrast with claim 7, Vejlgaard fails to teach or suggest a "a mobile communication device having a microprocessor, memory, mobile user interface, and conversion information for conversion between alphanumeric data and TTY formatted data" (See Applicants' Claims). Specifically, for the same reasons as those discussed above, Vejlgaard teaches a mobile communications "**system**" that enables TTY communications **NOT** a mobile communications "**device**" that has integrated TTY communications capability as taught in claim 7. Lieberman et al. fails to cure the deficiencies of Vejlgaard as it is completely silent as to these component features being integrated together in a mobile communication device.

Moreover, in contrast with claims 9-13, Vejlgaard fails to teach or suggest a mobile communication device capable of "converting TTY formatted data received by the mobile into alphanumeric data" (See Claim 9), "decoding TTY formatted data received by the mobile communication device with a decoder" (See Claim 10), "detecting TTY tone formatted data received by the mobile communication device with a TTY tone detector" (See Claim 11), "encoding TTY packet extension data to a signal for transmission from the mobile communication device" (See Claim 12), and "generating TTY tone formatted data for transmission from the mobile communication device" (See Claim 13), for the

same reasons as those discussed above. Lieberman et al. fails to cure the deficiencies of Vejlgaard as it is completely silent as to these functionalities being integrated together in a mobile communication device.

For at least the above reasons, the Applicants respectfully request that this rejection be withdrawn for claims 7 and 9-13. Claim 8 depends directly off of claim 7. Accordingly, the Applicants respectfully submit that claims 7-13 are in condition for allowance.

**C. Conclusion:**

For all the foregoing reasons, allowance of claims 1-13 pending in the present application is respectfully requested.

Respectfully submitted,

Dated: May 30, 2007

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